

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION

IN RE:	§	
	§	
STANLEY THAW,	§	CASE NO. 11-43603
	§	(Chapter 7)
DEBTOR	§	

**MOTION TO EXTEND TIME TO OBJECT TO DISCHARGE**

**TO THE HONORABLE BRENDA T. RHOADES, U.S. BANKRUPTCY JUDGE:**

Christopher J. Moser, the Chapter 7 Trustee herein ("Trustee") files his Motion to Extend Time to Object to Discharge ("Motion") as follows:

1. On December 2, 2011 (the "Date of Bankruptcy"), Stanley Thaw ("Debtor") filed a voluntary petition under Chapter 7 of the Bankruptcy Code.
2. Christopher J. Moser is the acting Chapter 7 Trustee of the Debtor's bankruptcy estate.
3. The Trustee has not concluded the Debtor's meeting of creditors due to the Debtor's medical issues. Moreover, the Debtor appears to have been involved in several complex million dollar real estate transactions. The Trustee needs additional time to fully investigate the financial affairs of the Debtor.
4. The Debtor's continued meeting of creditors is scheduled for March 2, 2012.
5. The deadline to file objections to discharge is March 6, 2012.
6. Trustee seeks a sixty (60) day extension of the deadline to file an objection to the Debtor's discharge under §727 of the Bankruptcy Code. During the sixty (60) days, Trustee will continue to investigate the Debtor's financial affairs and to hold the continued meeting of creditors wherein the Debtor can explain his financial affairs.

7. Trustee requests that the deadline for the creditors, the Trustee and/or the U.S. Trustee to object to the Debtor's discharge be extended for an additional sixty (60) days.

**WHEREFORE, PREMISES CONSIDERED** Trustee prays that this Court grant the Motion and that Trustee be granted such other and further relief to which he may be justly entitled.

Respectfully submitted,

QUILLING, SELANDER, LOWNDS,  
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By: /s/ Christopher J. Moser  
Christopher J. Moser

ATTORNEYS FOR TRUSTEE

**NOTICE**

**NO HEARING WILL BE CONDUCTED HEREON UNLESS A WRITTEN RESPONSE IS FILED WITH THE CLERK OF THE UNITED STATES BANKRUPTCY COURT AND SERVED UPON THE PARTY FILING THIS PLEADING WITHIN TWENTY ONE (21) DAYS FROM THE DATE OF SERVICE HEREOF UNLESS THE COURT SHORTENS OR EXTENDS THE TIME FOR FILING SUCH RESPONSE. IF NO RESPONSE IS TIMELY SERVED AND FILED, THIS PLEADING SHALL BE DEEMED TO BE UNOPPOSED AND THE COURT MAY ENTER AN ORDER GRANTING THE RELIEF SOUGHT. IF A RESPONSE IS FILED AND SERVED IN A TIMELY MANNER, THE COURT WILL THEREAFTER SET A HEARING. THE COURT RESERVES THE RIGHT TO SET A HEARING ON ANY MATTER.**

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing Motion has been served via regular U.S. mail, postage prepaid, on this 24<sup>th</sup> day of February, 2012 upon the following:

United States Trustee  
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/s/ Christopher J. Moser